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LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

July 19, 2021

The application is **GRANTED**. The deadline for Defendant to answer or otherwise respond to the Complaint is hereby extended to **September 7, 2021**. The initial conference scheduled for August 5, 2021, is hereby adjourned to **September 23, 2021, at 10:30 A.M.** The parties shall call (888) 363-4749 and use Access Code 558-3333. The time of the conference is approximate, but the parties shall be ready to proceed at that time. The parties shall exchange initial discovery and file their proposed CMP and joint letter by **September 16, 2021**.

BY ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.

Dated: July 20, 2021

New York, New York

Re: **Fritz v. Manhattan Beer Distributors LLC, 21-CV-4727 (LGS) (KHP)**
Request To Further Extend Time To Answer, Move, Or Otherwise Respond
To Complaint And To Exchange Initial Discovery

Dear Judge Schofield:

We represent the Defendant, Manhattan Beer Distributors LLC (“Manhattan Beer”) in the above-identified matter and we write with the consent of counsel for Plaintiff Fritz Lambert (“Plaintiff”) to request that the Court extend Manhattan Beer’s time to answer, move or otherwise respond to the Complaint from July 22, 2021 to and including September 7, 2021. In addition, we respectfully request that the Court extend the deadline for the parties to submit a proposed civil case management plan and to exchange documents and information pursuant to the Initial Discovery Protocols for Fair Labor Standards Act Cases Not Pleaded as Collective Actions to September 13, 2021, so that the discovery, including the exchange of initial discovery, does not occur before Manhattan Beer has filed its response to the Complaint. The reason for this request is that Plaintiff and Manhattan Beer have agreed to explore the possibility of resolving the matter without need for litigation and they wish to avoid the expenditure of time and resources by the Court and parties of preparing, serving and/or filing, and reviewing a responsive pleading and discovery materials. Counsel for Plaintiff consents to this extension. This is the second such request, and it affects no other scheduled dates.

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Thank you for Your Honor's consideration of this request.

Respectfully,

/s/ Adriana S. Kosovych

Adriana S. Kosovych

cc: Abdul K. Hassan, Esq. (via ECF)